

"Media Ownership Further Notice of Proposed Rulemaking. Docket 06-121."

Dual Network Ban- "The current rule permits common ownership of multiple broadcast networks but prohibits a merger between or among the "top four" networks, i.e., ABC, CBS, Fox and NBC. The restraint was not an issue in *Prometheus*. The *Further Notice* calls for comment on whether the restriction should be retained."

The dual network ban rule should be preserved in its current nature. This rule applies to ABC, CBS, Fox, and NBC since they are the competing news stations on broadcast television. As James Gattuso points out in *Myth of Media Concentration: Why the FCC's Media Ownership Rules Are Unnecessary*, despite many mergers in the media industry in recent years, Americans today actually enjoy more diversity and competition in the media than at any other time in history, thanks to cable TV, Internet, the licensing of new broadcast stations and other factors. This statement is true, Americans enjoy diversity, but I think that we already see this with the dual network ban. Cable TV and the Internet are not providing the public with diversity. An article in *Mediaweek* points out: The intense competition local broadcasters now face from digital and other news media makes the current ownership restrictions both obsolete and harmful to the public interest. On the other side J. Howard points out: On the contrary to the claims of NAB and other Big Media lobbyists, the reality of online news consumption is that very few Americans rely on the Internet as an important source of local news, and those that do use Web sites owned by Big Media companies.

Stations already compete for diversity. For example, I live in a small community of roughly 4,000 and most of our local news is broadcast on WQAD. WQAD is the news broadcast in my local area on the ABC network. My community also has broadcast news from WHBF (CBS), KWQC (NBC), and Fox 18 (FOX). With all three of these networks broadcasting my surrounding areas they are already competing for viewers in our small community of 4,000. If I want news on something that has happened in Aledo then I will tune to the network that has the most information. This gives people choice, and creates diversity among the networks and news stations.

If this rule was relaxed more than it already has been in the past ten years there could be less diversity. Let's say Viacom who owns CBS was able to own NBC which is currently owned by GE. There is the possibility that WHBF's network CBS, owned by Viacom which is now

also in control of NBC which broadcasts KWQC news would be similar. This would not create diversity. If these two news stations has the same owner for their network it is more likely that the news would be similar if not less diverse.

I think that it is unnecessary for these broadcast stations to compete for ownership and diversity. There already is diversity in the news. I would be skeptical of changing this rule and allowing it to be more relaxed for fear that it would actually cause less diversity. There is the potential for similarities if two broadcast news stations in my area, which does not have a lot of news to cover, had networks that were owned by the same company.

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